

AHMAD KESHAVARZ

Attorney at Law

16 COURT ST., 26TH FLOOR
BROOKLYN, NY 11241-1026

WWW.NEWYORKCONSUMERATTORNEY.COM
E-mail: ahmad@NewYorkConsumerAttorney.com

Telephone: (347) 308-4859
Fax: (877) 496-7809

June 29, 2023

VIA ECF

Magistrate Judge Marcia M. Henry
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Joint Motion on Schedule for Financial Discovery.

Fadlevich v. JD 34th Street Realty, LLC, No. 1:19-cv-04227-DG-MMH

Dear Judge Henry:

The undersigned represents Plaintiff Mark Fadlevich in this lawsuit alleging violations of the FDCPA and state law.

The Parties agree, with the consent of Court, that the deadline for Plaintiff to propound discovery to Gutman Defendants as to income, assets, and other financial information for the purposes of calculating an amount of punitive damages, should any be awarded, is adjourned until October 3, 2023 (90 days after the close of fact discovery) or, if prior to October 3, 2023 Gutman files a letter for pre-motion conference for summary judgment as to Plaintiff's state law claims, including any claim for punitive damages, then until 30 days after the a decision by Gutman Defendants not to pursue such a motion, or a ruling denying the motion should one be filed. Such discovery will last for 60 days. If the Court denies this joint application, then Gutman Defendants consent to sixty-day time period from the Court's denial of this joint application to proceed with discovery on this limited issue.

Respectfully,

/s/

Emma Catherine